UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

KAREN E. GRIFFIN,

Plaintiff,

v.

TOWN AND COUNTRY CREDIT CORP. and AMERIQUEST MORTGAGE COMPANY,

Defendants.

C.A. No. 07-10660-NMG

ASSENTED TO MOTION TO ENLARGE TIME TO RESPOND TO THE COMPLAINT

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, defendants Town and Country Credit Corp. and Ameriquest Mortgage Company ("Defendants") respectfully request that the Court enlarge the time within which they may answer or otherwise respond to plaintiff's Complaint ("Complaint") up through and including June 15, 2007. As grounds for the motion, Defendants state:

- 1. Defendants' response to the Complaint is currently due on May 1, 2007.
- 2. Plaintiff's counsel agreed to extend the time by which Defendants were to answer or otherwise respond to the Complaint.
- 3. This action has been designated as a "tag-along" action and is thus subject to a conditional transfer order ("CTO-1") to the U.S. District Court for the Northern District of Illinois (Hon. Marvin E. Aspen) in the MDL proceeding styled as <u>In re Ameriquest Mortgage</u>

 <u>Co. Mortgage Lending Practices Litigation</u>, MDL-1715. The action is not yet the subject of a final transfer order.

- 4. To permit them sufficient time to answer or otherwise respond to the Complaint, Defendants seek to extend the period in which they may do so up to and including June 15, 2007.
 - 5. Plaintiff's counsel has assented to this motion.

WHEREFORE, Defendants Town and Country Credit Corp. and Ameriquest Mortgage Company respectfully request that the Court enlarge the time within which they may answer or otherwise respond to the Complaint up through and including June 15, 2007.

> TOWN AND COUNTRY CREDIT CORP. and AMERIQUEST MORTGAGE **COMPANY**

By Their Attorneys,

PARTRIDGE SNOW & HAHN LLP

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/s/ Steven E. Snow

DATED: April 27, 2007

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of April, 2007, I electronically filed the ASSENTED TO MOTION TO ENLARGE TIME TO RESPOND TO THE COMPLAINT with the Clerk of the United States District Court for the District of Massachusetts using the CM/ECF System. The following participants have received notice electronically:

> Christopher M. Lefebvre, Esq. Claude Lefebvre, Esq.

> > /s/ Steven E. Snow

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